

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LOUISE ROGERS TATE,
Plaintiff(s),

Justice Castel
07-CV-5885

- against -
NAN GHOSH, MICHAEL CHOEN, MOHD D.
FARUGUE, ARISTISIDIS SHISMEROS,
WAI KWOK HA, GOLAM MORTUJA,
FRED WEINGARTEN, and HILTON HOTELS
CORPORATION,
Defendant(s).

**Answer to
Cross-Claim**

-----X
The defendant(s), **NANA GHOSH** by his attorney, **MARJORIE E. BORNES, ESQ.**,
answering the cross-claim of co-defendant **KWOK WAI HA s/h/a WAI KWOK HA** respectfully
alleges upon information and belief, as follows:

AS AND FOR HIS ANSWER TO THE CROSS-CLAIM

1. Denies each and every allegation contained in paragraph(s) of the Cross-Claim
as to defendant(s) Nana Ghosh.

W H E R E F O R E, the answering defendant(s) **NANA GHOSH**, demand(s) judgment
dismissing the complaint of the plaintiff(s) herein, or in the alternative, demands indemnification
and/or contribution from the co-defendants and/or plaintiff herein, together with the costs and
disbursements of this action.

Dated: New York, NY
October 31, 2007

Yours, etc.,

MARJORIE E. BORNES, ESQ. MB6505
Attorneys for Defendant(s)
Nana Ghosh
330 West 34th Street - 7th Floor
New York, NY 10001
(212) 857-8252

TO: JON L. NORINSBERG, ESQ

Attorney for Plaintiff(s) *Tate*
225 Broadway – Suite 2700
New York, NY 10007
(212) 791-5396

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(212) 857-8230

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GERBER & GERBER, PLLC

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26 Court Street – Suite 1405
Brooklyn, NY 11242

KAUFMAN BORGEESE & RYAN LLP

Michael P. Mezzacappa, Esq. (MM 0757)
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200 Summit Lake Drive, First Floor
Valhalla, New York, 10595
(914) 741-6100
Your File # 747.004

MICHAEL COHEN

22-05 43rd Avenue
Long Island City, NY 11101-5018

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CERTIFICATION OF SERVICE BY EFILING AND MAIL

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

I hereby certify that on October 31, 2007 the foregoing document **ANSWER TO CROSS-CLAIM** was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District=s Local Rules, and/or the Southern District=s Rules on Electronic Service, upon:

In addition, on October 31, 2007, I served the same papers described above by depositing a true copy of same enclosed in a post paid properly addressed wrapper in a post office under the exclusive care and custody of the U.S. Postal Service within the State of New York addressed to each attorney or party as follows:

TO: SEE RIDER

MARJORIE E. BORNES, ESQ

RIDER

By electronic filing:

TO: JON L. NORINSBERG, ESQ

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MICHAEL COHEN

22-05 43rd Avenue
Long Island City, NY 11101-5018

By regular mail:

TO: MICHAEL COHEN

22-05 43rd Avenue
Long Island City, NY 11101-5018

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ANSWER TO CROSS-CLAIM

MARJORIE E. BORNES, ESQ.

Attorney for Defendant(s) *Singh and Mandeep*
330 West 34th Street - 7th Floor
New York, NY 10001
(212) 857-8252

TO:

Attorney for _____

Service of a copy of the within _____ is hereby admitted.

Dated _____

Attorneys for _____

PLEASE TAKE NOTICE

Notice of Entry

that the within is a true copy of a _____ duly entered in the office of the Clerk of the within Court
on _____, 200 .

Notice of Settlement

that an order of which the within is a true copy will be presented for settlement to the Hon.
, one of the Judges of the within named Court, at _____ on _____ at _____ A.M.
Dated _____

MARJORIE E. BORNES, ESQ.

Attorney for Defendant(s)
Singh and Mandeep
330 West 34th Street - 7th Floor
New York, NY 10001
212-857-8252

TO:

Attorney for _____